

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

LIZELLE GONZALEZ

Plaintiff

Vs.

GOCHA ALLEN RAMIREZ, et al.

Defendant

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CIVIL ACTION 7:24-CV-00132

**PROPOSED AGREED CONFIDENTIALITY ORDER
FOR DOCUMENTS SUBMITTED UNDER SEAL**

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WHEREAS given the status of the Parties in this lawsuit, the nature of the claims, and the highly confidential nature of certain relevant documents, including but not limited to a Sheriff's Office investigative file, materials presented to a Grand Jury, and other documentation pertaining to the criminal justice system, and

WHEREAS Counsel for the respective Parties agree that documents from the Sheriff's Office investigative file contain highly personal, private, data and information, including what would otherwise be protected medical information; and,

WHEREAS Defendants in this cause have good cause to request that any documents from the Sheriff's Office should be submitted to the Court under Seal, but which in the interests of justice should be made available to Counsel for Plaintiff;

NOW THEREFORE, the Parties agree to the following proposed Protective Order as follows:

1. That the initial set of documents to be filed under sealed shall be seven documents consisting of 1) an incident report, 2) three investigative reports; 3) three grand jury subpoenas; and 4) one Brady sheet.
2. The documents shall be marked as "SEALED DOCUMENT #1 through SEALED DOCUMENT #7
3. Except as otherwise provided in this Order or subsequent court rulings, documents designated as "SEALED DOCUMENT # ____: shall not be disclosed or shown to anyone other than:

- a. Counsel of Record for the respective parties;
 - b. Legal support staff of the respective Counsel of Record for the purpose of assisting in the preparation of documents and filing pertaining to this action;
 - c. The Court or persons employed by the Court;
- 4.. Any modification or expansion to the inventory of Sealed Documents shall be submitted to the Court for approval and as a modification of this original protective order.

SO ORDERED.

SIGNED this _____ day of _____, 2024.

HON. DREW TIPTON
U.S. DISTRICT COURT

AGREED & APPROVED:

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